

concept exists. It is thus stated that restriction is therefore appropriate.

In accordance with the requirements of the applicable rules and statutes, applicants hereby provisionally elect Group II; namely, claims 17-22, for further prosecution. At the same time, however, applicants traverse this restriction requirement, and contend that the Examiner's position with respect to the significance of the Shackford *et al.* patent is incorrect.

Shackford *et al.* relates to a bleaching apparatus and includes a process as shown in FIG. 3 in which high consistency pulp is supplied from dewatering press 20 to pump 24, which forces the pulp through pipe 58 (see FIG. 4) into the inlet of vessel 52, which is a pin/foil contactor. The lower portion 70 of this vessel includes means for shredding and fluffing the pulp within the presence of a contacting gas including ozone, an oxygen carrier gas and byproduct reaction gases.

Claims 11 and 17 in the present application both specifically require the use of a gas tight conduit which is gas sealed from the surroundings for transporting the shredded pulp from the outlet of the pulp shredding vessel to the reaction vessel. In contrast, it can be seen that in Shackford's system, the shredded pulp drops externally of the dewatering press 20 from the shredding conveyor 22 in the pump 24.

In addition, both claims 11 and 17 include requirements for the interior of the outlet pipe directly communicating with the interior of the reaction vessel through the interior of the conduit. In contrast, the Shackford *et al.* method includes use of a pump 24 downstream of the shredding conveyor 22 and upstream of the reaction vessel 52. Pump 24 thus forces the high consistency pulp 23 in the form of an impervious moving plug within conduit 58 to effectively prevent

backflow of gas from vessel 52. This is in considerable contrast to the requirements of claims 11 and 17.

Finally, these claims also require regulating the gas pressure in the pulp shredding vessel so that the ozone gas is prevented from leaking upstream through the outlet pipe. No such elements are set forth in the Shackford et al. patent.

It is therefore clear that the presently claimed invention as set forth in claims 11 and 17 includes common elements which are not specifically disclosed in the prior art, and therefore withdrawal of the restriction requirement in this case is respectfully solicited. However, in view of applicants' above-noted provisional election of claims 17-22, it is also clear that this application is presently in condition for prosecution on the merits, and such action is therefore also respectfully solicited. If, however, for any reason the Examiner still does not believe that such action can be taken, it is respectfully requested that he telephone applicant's attorney at (908) 654-5000 in order to overcome any additional objections which he might have at this time.

If there are any additional charges in connection with this requested amendment, the Examiner is authorized to charge Deposit Account No. 12-1095 therefor.

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Respectfully submitted,

By 

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